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WILMERHALE

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July 3, 2012

Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Ghavami et al.*, 10 Cr. 1217 (KMW)

Dear Judge Wood:

GRANTED  
KNW

This letter is submitted on behalf of Wilmer Cutler Pickering Hale and Dorr LLP ("WilmerHale") in connection with the above-referenced matter. We will be filing today a motion to quash the subpoena issued on June 20, 2012 (the "Subpoena"). Please accept this letter as an application for an order allowing WilmerHale to file under seal its brief and declaration in support of its motion to quash the Subpoena. The materials requested by the Subpoena concern a witness in this matter that the Government has not publicly identified to date, and further, as set forth in the brief and declaration, the materials requested by the Subpoena are privileged under the attorney-client and work product doctrines.

I am available to respond to any questions the Court may have. Otherwise, I respectfully ask the Court to endorse the attached Order to Seal Documents.

Thank you for your consideration.

Very truly yours,

David Olsky

SO ORDERED: N.Y., N.Y.

7/3/12  
Kimba M. WoodKIMBA M. WOOD  
U.S.D.J.

Cc: all counsel

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